

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

INA STEINER, DAVID STEINER, and
STEINER ASSOCIATES, LC,

Plaintiffs,

V.

EBAY, INC., et al.,

Defendants.

Civil Action No. 1:21-CV-11181-PBS

DEFENDANT VERONICA ZEA'S RESPONSE TO DEFENDANT EBAY, INC.'S

REQUEST FOR ADMISSIONS, SET ONE

Defendant Veronica Zea hereby responds to Defendant eBay, Inc.'s First set of Requests for Admissions.

REQUEST FOR ADMISSION NO. 1:

Prior to August 20, 2019, You never directly communicated to any eBay Executive that You or any other Criminal Defendant planned to, intended to, or did criminally stalk and cyberstalk Ina Steiner and/or David Steiner.

RESPONSE TO REQUEST FOR ADMISSION NO. 1:

Admit.

REQUEST FOR ADMISSION NO. 2:

Prior to August 20, 2019, You never directly communicated to any Board of Directors member at eBay that You or any other Criminal Defendant planned to, intended to, or did criminally stalk and cyberstalk Ina Steiner and/or David Steiner.

RESPONSE TO REQUEST FOR ADMISSION NO. 2:

Admit.

REQUEST FOR ADMISSION NO. 3:

Prior to August 20, 2019, You never indirectly communicated to any eBay Executive that You or any other Criminal Defendant planned to, intended to, or did criminally stalk and cyberstalk Ina Steiner and/or David Steiner.

RESPONSE TO REQUEST FOR ADMISSION NO. 3:

Admit.

REQUEST FOR ADMISSION NO. 4:

Prior to August 20, 2019, You never indirectly communicated to any Board of Directors member at eBay that You or any other Criminal Defendant planned to, intended to, or did criminally stalk and cyberstalk Ina Steiner and/or David Steiner.

RESPONSE TO REQUEST FOR ADMISSION NO. 4:

Admit.

REQUEST FOR ADMISSION NO. 5:

Prior to August 20, 2019, You never directly communicated to anyone at eBay other than the Criminal Defendants that You or any other Criminal Defendant planned to, intended to, or did criminally stalk and cyberstalk Ina Steiner and/or David Steiner.

RESPONSE TO REQUEST FOR ADMISSION NO. 5:

Deny.

REQUEST FOR ADMISSION NO. 6:

Prior to August 20, 2019, You never indirectly communicated to anyone at eBay other than the Criminal Defendants that You or any other Criminal Defendant planned to, intended to, or did engage in any criminal activity towards Ina Steiner and/or David Steiner.

RESPONSE TO REQUEST FOR ADMISSION NO. 6:

Objection. This Request is vague and ambiguous as to the meaning of "indirect communication" and on that basis the Request is denied. Responding Party did participate in

discussions regarding James Baugh's plans with eBay personnel other than the Criminal Defendants.

REQUEST FOR ADMISSION NO. 7:

You attempted to conceal the Criminal Conduct that You engaged in from persons at eBay other than the Criminal Defendants.

RESPONSE TO REQUEST FOR ADMISSION NO. 7:

Admit that Responding Party followed directions by Jim Baugh not to tell anyone outside of the Global Security and Resiliency team at eBay about the events.

REQUEST FOR ADMISSION NO. 8:

You used WhatsApp to communicate about the Criminal Conduct.

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

Admit that the Global Security and Resiliency team frequently used WhatsApp to communicate, including in Natick.

REQUEST FOR ADMISSION NO. 9:

WhatsApp is a messaging program not authorized by eBay.

RESPONSE TO REQUEST FOR ADMISSION NO. 9:

Responding Party has insufficient information on which to base a response to this Request.

REQUEST FOR ADMISSION NO. 10:

You attempted to conceal the Criminal Conduct that You engaged in from persons at eBay other than the Criminal Defendants, by among other things, communicating about the Criminal Conduct via WhatsApp.

RESPONSE TO REQUEST FOR ADMISSION NO. 10:

Deny. At the time, Responding Party did not know that the intention behind using WhatsApp was to conceal messages from others at eBay. Responding Party was just using the platform she was instructed to use by her superiors.

REQUEST FOR ADMISSION NO. 11:

You attempted to conceal the Criminal Conduct that You engaged in from persons at eBay other than the Criminal Defendants by, among other things, deleting messages about the Criminal Conduct.

RESPONSE TO REQUEST FOR ADMISSION NO. 11:

Admit that Responding Party was directed by Jim Baugh to delete messages pertaining to the activity in Natick. Responding Party did not fully understand the intent at the time. Jim Baugh also deleted messages from Responding Party's device (laptop) himself.

REQUEST FOR ADMISSION NO. 12:

You attempted to conceal the Criminal Conduct that You engaged in from persons at eBay other than the Criminal Defendants by, among other things, lying to and/or hiding the truth from eBay and/or law enforcement personnel regarding the Criminal Conduct.

RESPONSE TO REQUEST FOR ADMISSION NO. 12:

Admit that Responding Party was directed by Jim Baugh not to tell anyone outside of the Global Security and Resiliency team at eBay about the events. He gave Responding Party a "cover story" to provide Amir Vonsover and his team. Baugh told Responding Party the events were "above their pay grade" and that she was to provide the "cover story" to them until Baugh could speak with their superiors. Responding Party did not knowingly lie to law enforcement personnel.

REQUEST FOR ADMISSION NO. 13:

eBay had a Code of Business Conduct & Ethics effective August 2019.

RESPONSE TO REQUEST FOR ADMISSION NO. 13:

Responding Party has insufficient information on which to base a response to this Request.

REQUEST FOR ADMISSION NO. 14:

You were aware prior to August 2019 that the Code of Business Conduct & Ethics applied to You.

RESPONSE TO REQUEST FOR ADMISSION NO. 14:

Responding Party has insufficient information on which to base a response to this Request.

REQUEST FOR ADMISSION NO. 15:

eBay provided You information and training on Your obligation to comply with eBay's Code of Business Conduct & Ethics prior to August 2019.

RESPONSE TO REQUEST FOR ADMISSION NO. 15:

Responding Party has insufficient information on which to base a response to this Request.

REQUEST FOR ADMISSION NO. 16:

eBay provided You training on its conduct and ethics policies, and Your obligation to comply with the same, in 2019 prior to the Criminal Conduct.

RESPONSE TO REQUEST FOR ADMISSION NO. 16:

Responding Party has insufficient information on which to base a response to this Request.

REQUEST FOR ADMISSION NO. 17:

eBay had an integrity hotline that any eBay employee or contractor could use to anonymously report actual or potential violations of the law, eBay's Code of Business Conduct & Ethics, or other eBay policies.

RESPONSE TO REQUEST FOR ADMISSION NO. 17:

Responding Party has insufficient information on which to base a response to this Request.

REQUEST FOR ADMISSION NO. 18:

Prior to August 20, 2019, you were aware that eBay had an integrity hotline.

RESPONSE TO REQUEST FOR ADMISSION NO. 18:

Responding Party has insufficient information on which to base a response to this Request.

REQUEST FOR ADMISSION NO. 19:

You did not submit expenses or reimbursement requests for expenses incurred during the Criminal Conduct to any person at the PFC Group of Companies prior to August 20, 2019.

RESPONSE TO REQUEST FOR ADMISSION NO. 19:

Responding Party has insufficient information on which to base a response to this Request.

REQUEST FOR ADMISSION NO. 20:

You did not use any eBay reporting mechanism to report to any eBay Executive or to any member of eBay's legal, ethics, compliance, or human resources departments that You or any other Criminal Defendant planned to, intended to, or did engage in any criminal activity towards Ina Steiner and/or David Steiner.

RESPONSE TO REQUEST FOR ADMISSION NO. 20:

Responding Party admits that she did not feel comfortable reporting her concerns to anyone at eBay because it was her understanding that the higher ups were all aware of Jim Baugh's "operation." Responding Party feared that someone would tell Baugh that she was talking about his plans, and she was scared of retaliation.

REQUEST FOR ADMISSION NO. 21:

You did not report to any person at eBay more senior than Jim Baugh that You or any other Criminal Defendant planned to, intended to, or did engage in any criminal activity towards Ina Steiner and/or David Steiner.

RESPONSE TO REQUEST FOR ADMISSION NO. 21:

Admit.

REQUEST FOR ADMISSION NO. 22:

Prior to August 20, 2019, You did not inform any person at the PFC Group of Companies that You or any other Criminal Defendant planned to, intended to, or did engage in any criminal activity towards Ina Steiner and/or David Steiner.

RESPONSE TO REQUEST FOR ADMISSION NO. 22:

Admit.

REQUEST FOR ADMISSION NO. 23:

You did not share the "eBay Open 2019 Top POI's" document that discussed the Steiners with anyone other than the Criminal Defendants.

RESPONSE TO REQUEST FOR ADMISSION NO. 23:

Documents pertaining to Persons of Interest (POIs) were frequently edited and shared amongst members of the Global Security & Resiliency team regarding the eBay Open event. I do not recall specifically what the document referred to looked like, what specific information it contained, nor with whom it was shared.

REQUEST FOR ADMISSION NO. 24:

You did not make any complaint or other negative report regarding Jim Baugh's behavior to any eBay Executive or via any periodic survey by eBay (such as Glint or Pulse surveys).

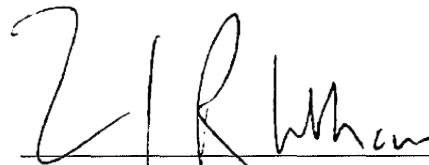
RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Admit that Responding Party did not make any direct complaints to an eBay executive about Jim Baugh's behavior because Responding Party feared that anyone she told would (1) be in support of the actions and/or (2) inform Baugh of her complaints and that she would face retaliation. Responding Party only remembers taking one "anonymous" survey, but its questions were regarding Stephanie Popp, not Baugh. Surveys were not a "safe" way for Responding Party to complain about her superiors' behavior as Popp only had three direct reports. Responding Party recalls Popp receiving the responses and immediately figuring out who submitted each one.

DATED: SEPTEMBER 23, 2024

BERLINER COHEN LLP

BY:



FRANK R. UBHAUS

ATTORNEYS FOR DEFENDANT VERONICA ZEA

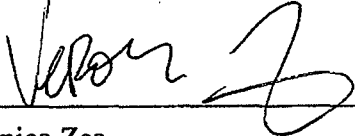
INDIVIDUAL VERIFICATION

(C.C.P. §§ 446, 2015.5)

I declare that:

I am a Defendant in this action. I have read the foregoing Defendant Veronica Zea's Response to Defendant eBay, Inc.'s Requests for Admissions, Set One and know its contents and the contents thereof are true of my own knowledge, except as to those matters which are herein stated on my information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct and that this Verification was executed this 5 day of September, 2024.



Veronica Zea